

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH**

JENNIFER MOORE, individually and on behalf of all  
others similarly situated,

*Plaintiff,*

vs.

JOHN C. HEATH, ATTORNEY AT LAW, PLLC  
d/b/a LEXINGTON LAW FIRM,

*Defendant.*

**CLASS ACTION**

**CASE NO. 2:21-cv-00027-TC**

**JURY TRIAL DEMANDED**

**JOINT MOTION TO STAY**

Plaintiff Jennifer Moore and Defendant John C. Heath, Attorney at Law, PLLC d/b/a Lexington law Firm hereby jointly request a stay of forty-five (45) days of the case to allow the parties to attend mediation and conserve judicial resources and avoid additional litigation costs, and in support state:

To date, the parties have engaged in extensive written discovery, depositions, non-party discovery and depositions, and motion practice. With the benefit of a complete record, the parties would like the opportunity to attend mediation and are in the process of selecting a mediator and date for mediation. There are a number of deadlines approaching in the case, including Plaintiff's Motion for Class Certification (March 30, 2022) and the close of fact discovery (April 15, 2022). The parties would like an opportunity to coordinate and attend mediation. Accordingly, to conserve judicial and party resources, they respectfully request a stay of forty-five (45) days to attend mediation and attempt to resolve the case. The parties therefore request that the deadline for Plaintiff's Motion for Class Certification be extended to May 16, 2022, and the close of fact discovery be extended to May 30, 2022.

Plaintiff's counsel and Defendant's counsel have met and conferred regarding the requested relief, and all parties have agreed to the foregoing. This motion is made in good faith and not for the purpose of delay. Plaintiff's counsel and Defendant's counsel, therefore, respectfully request that this Court grant this joint motion as it is in the best interests of the Court and the parties.

**WHEREFORE**, Plaintiff Jennifer Moore and Defendant John C. Heath, Attorney at Law, PLLC d/b/a Lexington law Firm respectfully request an Order granting the instant motion, and for such other relief deemed appropriate by the Court.

Dated: March 21, 2022

Respectfully Submitted,

By: **HIRALDO P.A.**

/s/ Manuel S. Hiraldo

Manuel Hiraldo, Esq.

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(*pro hac vice*)

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*Counsel for Plaintiff*